

Remarks

Favorable reconsideration of this application, in view of the following remarks and discussion, is respectfully requested.

Claims 1-20 are currently pending in the application.

In the outstanding Office Action, Claims 1-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,405,242 to Watanabe et al. (Watanabe) in view of U.S. Patent No. 5,862,211 to Kobayashi and U.S. Patent No. 5,988,817 to Mizushima et al. (Mizushima). Applicants respectfully request that the rejection of the claims be withdrawn for the following reasons.

The present invention is directed to projection display apparatuses. Independent Claim 1 recites a communication control section configured to control communication with an external device by at least one of a first communication port and a second communication port, the second communication port adapted to be connected to an additional projection display apparatus. A control section is configured to, in response to an initialization signal input through the first communication port, store ID information in a storage section regarding an identity of the projection display apparatus based on the initialization signal, update the initialization signal according to a predetermined rule, and transmit the updated initialization signal through the second communication port. Independent Claim 11 recites communication control section means for controlling communication with an external device by at least one of a first communication port means and a second communication port means, the second communication port means for connecting to an additional projection display apparatus. Control means, in response to an initialization signal input through the first communication port means, store ID information in a storage means regarding an identity of the projection display apparatus based on the initialization signal, update the initialization

signal according to a predetermined rule, and transmit the updated initialization signal through the second communication port means.

Watanabe is directed to a computer terminal operation system. As shown in Figure 1, for example, of Watanabe, a computer terminal operation system is realized by a computer network comprising a number of terminals 10, 20, 30 . . . etc. All terminals are connected via a computer network such as a LAN 50. The terminals include a point information part 101, a key code input part 102, a controller 103 and output part 104.¹ As the output part 104, an output sub-system such as a display monitor can be used. This computer terminal operation system can be used as an electronic conference system by connecting a large projection monitor to one of the terminals and controlling the terminal with the large projection monitor from the other terminals.²

Applicants respectfully assert, however, and the Office Action concedes, that Watanabe does not teach or suggest, the claimed features of a projection display apparatus including a second communication port adapted to be connected to an additional projection display apparatus, as recited in independent Claims 1 and 11.³ Therefore, Applicants respectfully assert that Watanabe also does not teach or suggest the claimed features of a control section configured to transmit an updated initialization signal including information regarding an identity of the projection display apparatus through the second communication port, as recited in the independent claims.

Specifically, independent Claim 1 recites “the second communication port adapted to be connected to an additional projection display apparatus[, and] a control section configured to . . . store ID information in the storage section regarding an identity of the projection display apparatus based on the initialization signal, update the initialization signal . . . , and

¹ Column 5, lines 55-62.

² Column 6, lines 17-24.

³ Page 4, lines 19-21, of the outstanding Office Action.

transmit the updated initialization signal through the second communication port.”

Independent Claim 11 recites “the second communication port means for connecting to an additional projection display apparatus[, and] control means for . . . storing ID information in the storage means regarding an identity of the projection display apparatus based on the initialization signal, updating the initialization signal . . . , and transmitting the updated initialization signal through the second communication port means.”

The Office Action relies on Kobayashi and Mizushima in an attempt to remedy the deficiencies of Watanabe. However, Applicants respectfully assert that none of Kobayashi and Mizushima teach or suggest the claimed features of a projection display apparatus including a second communication port adapted to be connected to an additional projection display apparatus, and a control section configured to transmit an updated initialization signal including information regarding an identity of the projection display apparatus through the second communication port, as recited in independent Claims 1 and 11.

Rather, Kobayashi is directed to an electronic controller. As shown in Figure 1, for example, of Kobayashi, the engine controller (or engine control unit) includes an input/output circuit 8 and an input/output circuit 10. The input/output circuit 8 processes the signals from various sensors that are provided in an engine 1, provides the resulting signals to the A microprocessor 4 and receives the control signals from the A microprocessor 4 to open and close an electronic throttle valve. The input/output circuit 10 processes the signals from various sensors that are provided in the engine 1, provides the resulting signals to the B microprocessor 6 and receives the control signals from the B microprocessor 6 to drive an injector and an igniter that are installed in the engine 1.⁴

However, Applicants respectfully assert that Kobayashi does not teach or suggest, and the Office Action does not assert that Kobayashi teaches or suggests, the claimed features of

⁴ From column 6, line 52 to column 7, line 2.

a projection display apparatus including a second communication port adapted to be connected to an additional projection display apparatus, and therefore also does not teach or suggest the claimed features of a control section configured to transmit an updated initialization signal including information regarding an identity of the projection display apparatus through the second communication port, as recited in independent Claims 1 and 11. Rather, Applicants respectfully assert that the engine controller/engine control unit is not a projection display apparatus, and therefore no projection display apparatus includes a communication port adapted to be connected to an additional projection display apparatus, and further no information regarding an identity of a projection display apparatus is transmitted through a communication port to an additional projection display apparatus, for example, in Kobayashi.

Mizushima is directed to a multiprojection system. As shown in Figure 6, for example, of Mizushima, a screen image control signal from a lighting operation console 90 is converted into a RS-232C signal by a personal computer 91 and outputted to each projector 1.⁵ As shown in Figure 6, image signals are transmitted to each projector by a multiple video processor (MVP) 93.

However, Applicants respectfully assert that Mizushima does not teach or suggest the claimed features of a projection display apparatus including a second communication port adapted to be connected to an additional projection display apparatus, and a control section configured to transmit an updated initialization signal including information regarding an identity of the projection display apparatus through the second communication port, as recited in independent Claims 1 and 11. Rather, Applicants respectfully assert that Mizushima does not state that information regarding an identity of one of the projectors 1 is

⁵ Column 12, lines 14-16.

transmitted through the communication port to another one of the projectors 1, for example, in Mizushima.

Thus, Applicants respectfully submit that the above-rejection of independent Claims 1 and 11 in view of Watanabe, Kobayashi, and Mizushima is based on the improper application of hindsight considerations. It is well settled that it is impermissible simply to engage in hindsight reconstruction of the claimed invention, using Applicants' structure as a template and selecting elements from the references to fill in the gaps.⁶ Recognizing, after the fact, that a modification of the prior art would provide an improvement or advantage, without suggestion thereof by the prior art, rather than dictating a conclusion of obviousness, is an indication of improper application of hindsight considerations. (Underlining added). Simplicity and hindsight are not proper criteria for resolving obviousness.⁷ Further, Applicant respectfully submits that the "fact that references can be combined or modified is not sufficient to establish *prima facie* obviousness."⁸ Therefore, Applicant respectfully asserts that an improper "obvious to try" rationale is being applied in the Office Action.⁹ Specifically, because none of Watanabe, Kobayashi, and Mizushima teaches or suggests the desirability of the claimed features a control section configured to transmit an updated initialization signal including information regarding an identity of the projection display apparatus through a second communication port, Applicants respectfully assert that the Office Action has failed to establish a *prima facie* case of obviousness, and Applicants respectfully submit that the rejection of independent Claims 1 and 11 under 35 U.S.C. § 103(a) is improper. Thus, Applicants respectfully request that the rejection of independent Claims 1 and 11 under 35 U.S.C. § 103(a) be withdrawn, and the independent claims allowed.

⁶ *In re Gorman*, 933 F.2d 982, 18 USPQ2d 1885 (Fed. Cir. 1991).

⁷ *In re Warner*, 397 F.2d 1011, 154 USPQ 173 (CCPA 1967).

⁸ See Heading under MPEP 2143.01.

⁹ See MPEP 2145 X.B.

Application No. 09/770,415
Reply to Office Action of July 16, 2003

Dependent Claims 2-10 and 12-20 depend from independent Claims 1 and 11, and are therefore also allowable for at least the same reasons as the independent claims, as well as for their own recited features. Thus, for at least these reasons, Applicants respectfully request that the rejection of dependent Claims 2-10 and 12-20 under 35 U.S.C. § 103(a) be withdrawn and the dependent claims allowed.

Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact the undersigned representative at the below listed telephone number.



22850

Tel: (703) 413-3000
Fax: (703) 413 -2220

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.

A handwritten signature in black ink, appearing to read 'G. Maier', written over a horizontal line.

Gregory J. Maier
Registration No. 25,599
Attorney of Record

Christopher D. Ward
Registration No. 41,367